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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA – FRESNO DIVISION

PAMELA WELTY, on behalf of herself
and all persons similarly situated,

Plaintiff,

v.

VALVE CORPORATION, a corporation,

Defendant.

CASE NO.: 1:25-cv-00696-SAB

**JOINT STIPULATION SETTING TIME
TO RESPOND TO CLASS ACTION
COMPLAINT**

Judge: Hon. Stanley A. Boone
Courtroom: 9, 6th floor

**JOINT STIPULATION SETTING TIME
TO RESPOND TO CLASS ACTION COMPLAINT**

Plaintiff Pamela Welty (“Plaintiff”) and Defendant Valve Corporation (“Defendant”), by and through their respective undersigned attorneys, hereby stipulate as follows in the above-captioned civil action:

WHEREAS, on June 6, 2025, Defendant removed this putative class action from the Superior Court of California, County of Tuolumne, to this Court;

WHEREAS, under Rule 81(c)(2)(C) of the Federal Rules of Civil Procedure, Defendant’s response to the Complaint would have been due on June 13, 2025, seven (7) days after the Notice of Removal was filed;

WHEREAS, pursuant to Local Rule 144, the Parties stipulated and agreed to a twenty-eight (28) day extension beyond the seven (7) day time period prescribed for the response by FRCP 81 (Dkt. No. 3);

WHEREAS, Defendant’s response to the Complaint is currently due by July 11, 2025;

WHEREAS, Defendant intends to move this Court (i) to transfer this action to the United States District Court for the Western District of Washington pursuant to 28 U.S.C. § 1404 and, separately, (ii) to dismiss the Complaint pursuant to Federal Rule of Civil Procedure 12(b)(6);

WHEREAS, pursuant to Local Rule 144, the Parties stipulate and agree (i) to an additional seven (7) day extension for Defendant to move to transfer pursuant to 28 U.S.C. § 1404, which would set Defendant’s deadline to file that motion as July 18, 2025; and (ii) that Defendant will file its Rule 12(b)(6) motion or otherwise respond to the Complaint seven (7) days after the Court denies transfer or the Western District of Washington docket the case;

THEREFORE, IT IS HEREBY STIPULATED AND AGREED, between the Parties, by and through their undersigned attorneys of record that:

1 1. Defendant's deadline to move this Court to transfer venue pursuant to 28 U.S.C.
2 § 1404 is extended to July 18, 2025;

3 2. Plaintiff's deadline to oppose Defendant's motion to transfer is accordingly
4 extended to August 1, 2025;

5 3. Defendant's deadline to file a reply in support of its motion to transfer is accordingly
6 extended to August 11, 2025;

7 4. Defendant's deadline to answer or otherwise reply to the Complaint is extended to
8 either (i) seven (7) days after the Court enters an order denying transfer; or (ii) seven (7) days after
9 the Western District of Washington docket the case if the Court grants transfer;

10 5. This extension of Defendant's deadline to file its motion to transfer and to respond
11 to the Complaint is without prejudice to either party's right to seek relief from any deadlines from
12 the Court; and

13 6. Nothing herein shall be deemed to constitute a waiver of any rights, claims,
14 defenses, motions, or objections that a party may have or make with respect to jurisdiction, venue,
15 or the claims set forth in this action.

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19 DATED: July 9, 2025

SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP

20
21 By: /s/ Virginia F. Milstead
22 Virginia F. Milstead
Attorneys for Defendant Valve Corporation

23 DATED: July 9, 2025

24 MASON LLP
25 By: /s/ Danielle L. Perry
26 Danielle L. Perry
27 Attorneys for Plaintiff Pamela Welty
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1 **IT IS SO ORDERED.**

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3 DATED: _____

/s/ _____

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HONORABLE STANLEY A. BOONE
UNITED STATES MAGISTRATE JUDGE

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